REMARKS

Reconsideration of the present application is respectfully requested.

Claims 1-22 are pending in the present application. No claims have been amended, canceled or added.

Claims 1, 16 and 18-21 are rejected. Claims 2-15, 17 and 22 are objected to.

Drawings

Applicant respectfully requests the Examiner to indicate if the drawings originally submitted with the application on Sep. 28, 2000 are accepted by the Examiner.

Claim rejections under 35 U.S.C. §102(b)

Examiner has rejected claims 1 and 20-21 under 35 U.S.C. §102(b) as being anticipated by EP Patent No. 030176 to Stansfield, et al. (hereinafter "Stansfield").

Stansfield discloses descreening a screened separation. (Stansfield, col. 1, lines 1-2). The screened separation is scanned at a resolution higher than the screen ruling to generate a complete binary representation. (Stansfield, Figure 3, step 31; col. 3, lines 29-34). The binary representation is converted to low resolution grey scale. (Stansfield, Figure 3, step 32; col. 4, lines 23-26). Accordingly, a processor scans the high resolution binary representation data by stepping a window having 6 by 6 high resolution pixels across the data. (Stansfield, col. 3, lines 34-51). The resulting low resolution grey scale representation separation is then descreened. (Stansfield, col. 4, lines 27-30; col. 3, lines 52-53).

<u>Claim 1</u>

Applicants respectfully submit that Stansfield does not teach or suggest

"performing a <u>screen conversion filter</u> upon a scanned representation of said halftone

image to produce an intermediate image," as recited in independent claim 1.

With respect to this limitation, the Examiner notes:

> Stansfield et al discloses (Figure 3; column 3, line 58- column 4, line 9) a
> halftone descreening arrangement in which a first descreening filter
> operation (32, 33) is applied to an image to produce an intermediate
> image....

(Office Action dated 02/27/06, p. 2, ¶2).

In the cited portions, Stansfield discloses:

> It is preferred to carry out descreening in the transform domain in which
> case the content of the low resolution store 9 is typically fed in 128 x 128
> low resolution pixel blocks to a fast fourier transform (FFT) circuit 10 for
> conversion into the frequency domain (step 33). The output signals from
> the circuit 10 are fed to a multiplier circuit 11 where the data is multiplied
> by digital data from a filter store 12 representing a low pass filter in the
> frequency domain. (Step 34).

(Stansfield, column 3, line 58- column 4, line 9).

Stansfield further discloses step 32 as follows:

> A microcomputer 4 then scans the high resolution data in the store 3 by
> stepping a window having dimension 6 x 6 high resolution pixels across
> the stored version.... In each position of the window, the binary values
> within the window are summed.... The resultant summations are stored in
> a low resolution store 9 which will eventually contain a low resolution, grey
> level representation of the original separation (step 32).

(Stansfield, column 3, lines 34-51).

Thus Stansfield discloses only that a high resolution binary representation of a

screened representation is processed to convert to low resolution grey scale by

stepping a window across the binary representation. Stansfield is silent about and does

not teach or suggest "performing a <u>screen conversion filter</u> upon a scanned representation of said halftone image to produce an intermediate image," as claimed.

As such claim 1, and associated dependent claims 2-15 are not anticipated by Stansfield.

Claim 20

In claim 20, Applicant claims a "processor to perform a <u>screen conversion filter</u> upon said input image and create an intermediate image." With respect to this limitation, the Examiner notes:

> Stansfield et al discloses (Figure 3; column 3, line 58- column 4, line 9) a halftone descreening arrangement in which a first descreening filter operation (32, 33) is applied to an image to produce an intermediate image....

(Office Action dated 02/27/06, p. 2, ¶2).

As discussed, in the cited portions and elsewhere, Stansfield discloses only that a high resolution binary representation of a screened representation is processed to convert to low resolution grey scale by stepping a window across the binary representation. Stansfield is silent about and does not teach or suggest a "processor to perform a <u>screen conversion filter</u> upon said input image and create an intermediate image," as recited in independent claim 20.

As such claim 20 is not anticipated by Stansfield.

Claim 21

In claim 21, Applicant claims a "converting <u>dots</u> of said halftone image into <u>parallel lines</u> of an intermediate image." With respect to this limitation, the Examiner notes:

> Stansfield et al discloses (Figure 3; column 3, line 58- column 4, line 9) a halftone descreening arrangement in which a first descreening filter operation (32, 33) is applied to an image to produce an intermediate image....

(Office Action dated 02/27/06, p. 2, ¶2).

As discussed, in the cited portions and elsewhere, Stansfield discloses only that a high resolution binary representation of a screened representation is processed to convert to low resolution grey scale by stepping a window across the binary representation. Stansfield is silent about and does not teach or suggest a "converting <u>dots</u> of said halftone image into <u>parallel lines</u> of an intermediate image," as recited in claim independent 21.

As such claim 21 and associated dependent claim 22 are not anticipated by Stansfield.

Claim rejections under 35 U.S.C. §103(a)

Examiner has rejected claims 16 and 18-19 under 35 U.S.C. §103(a) as being unpatentable over Stansfield in view of alleged knowledge in the art.

<u>Claim 16</u>

In claim 21, Applicant claims a "performing a <u>single convolution filter</u> upon a scanned representation of said halftone image to produce an output image." With respect to this limitation, the Examiner notes:

> Stansfield et al discloses (Figure 3; column 3, line 58- column 4, line 9) a halftone descreening arrangement in which a first descreening filter operation (32, 33) is applied to an image to produce an intermediate image....

(Office Action dated 02/27/06, p. 2, ¶2).

As discussed, in the cited portions and elsewhere, Stansfield discloses only that a high resolution binary representation of a screened representation is processed to convert to low resolution grey scale by stepping a window across the binary representation. Stansfield is silent about and does not teach or suggest a "performing a single convolution filter upon a scanned representation of said halftone image to produce an output image," as claimed.

Further, the alleged knowledge in the art that a known method can be implemented in the form of computer software stored on a computer-readable medium does not teach or suggest the missing limitation.

As such claim 16 and associated dependent claim 17 are not obvious over Stansfield in view of alleged knowledge in the art.

Claim 18

In claim 18, Applicant claims a "a first sequence to perform a screen conversion filter upon a scanned representation of a halftone image to produce an intermediate image." With respect to this limitation, the Examiner notes:

> Stansfield et al discloses (Figure 3; column 3, line 58- column 4, line 9) a halftone descreening arrangement in which a first descreening filter operation (32, 33) is applied to an image to produce an intermediate image....

(Office Action dated 02/27/06, p. 2, ¶2).

As discussed, in the cited portions and elsewhere, Stansfield discloses only that a high resolution binary representation of a screened representation is processed to convert to low resolution grey scale by stepping a window across the binary representation. Stansfield is silent about and does not teach or suggest a "a first sequence to perform <u>a screen conversion filter</u> upon a scanned representation of a halftone image to produce an intermediate image," as claimed.

Further, the alleged knowledge in the art that a known method can be implemented in the form of computer software stored on a computer-readable medium does not teach or suggest the missing limitation.

As such claim 18 is not obvious over Stansfield in view of alleged knowledge in the art.

<u>Claim 19</u>

In claim 19, Applicant claims a "a first sequence to perform <u>a screen conversion filter</u> upon a scanned representation of a halftone image to produce an intermediate image." With respect to this limitation, the Examiner notes:

> Stansfield et al discloses (Figure 3; column 3, line 58- column 4, line 9) a halftone descreening arrangement in which a first descreening filter operation (32, 33) is applied to an image to produce an intermediate image....

(Office Action dated 02/27/06, p. 2, ¶2).

As discussed, in the cited portions and elsewhere, Stansfield discloses only that a high resolution binary representation of a screened representation is processed to convert to low resolution grey scale by stepping a window across the binary representation. Stansfield is silent about and does not teach or suggest "a first

sequence to perform <u>a screen conversion filter</u> upon a scanned representation of a halftone image to produce an intermediate image," as claimed.

Further, the alleged knowledge in the art that a known method can be implemented in the form of computer software stored on a computer-readable medium does not teach or suggest the missing limitation.

As such claim 19 is not obvious over Stansfield in view of alleged knowledge in the art.

Allowable Claims

Applicant thanks the Examiner for indicating that claims 2-15, 17 and 22 are allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claim.

However, Applicant respectfully submits that claims 2-15, 17 and 22 are also allowable because the associated independent claims 1, 16, and 21 are patentable over Stansfield.
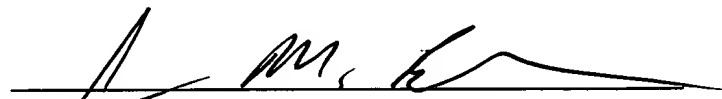
Applicant respectfully submits that in view of the discussion set forth herein, the applicable rejections have been overcome. Accordingly, the present and amended claims should be found to be in condition for allowance.

If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Jordan M. Becker at (408) 720-8300.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: 5/24, 2006

Jordan M. Becker
Reg. No. 39,602

Customer No. 08791
12400 Wilshire Blvd.
Seventh Floor
Los Angeles, CA 90025
(408) 720-8300